

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

NORTH JERSEY MEDIA GROUP INC.,

Plaintiff,

v.

DEPOSITPHOTOS, INC. d/b/a
DEPOSITPHOTOS.COM,

Defendant.

Docket No. 12-CV-04785-JGK

ORAL ARGUMENT REQUESTED

DEPOSITPHOTOS, INC.'S NOTICE OF
MOTION FOR JUDGMENT ON THE PLEADINGS

PLEASE TAKE NOTICE that upon the accompany Memorandum of Law dated August 12, 2014, the Complaint dated June 27, 2014, including all of the exhibits appended thereto, and the Answer and Verified Counterclaim dated August 12, 2014, including all of the exhibits appended thereto, and all filings in this action, Defendant DepositPhotos, Inc. d/b/a DepositPhotos.com, by and through its undersigned attorneys, will move this Court at the United States Courthouse for the Southern District of New York, Courtroom 12B, New York, New York, before the Honorable John G. Koeltl, United States District Judge, on such date as the Court will determine, for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c) in the above-captioned action with prejudice.

Dated: August 12, 2014

Respectfully submitted,
DepositPhotos, Inc., d/b/a DepositPhotos.com,
By its attorneys,

/s/ Martin F. Gusy (MG2504)

Martin F. Gusy, Esq.
Matthew J. Weldon, Esq.
COZEN O'CONNOR
277 Park Avenue
New York, NY 10172
mgusy@cozen.com
(212) 883-4900

/s/ Evan Fray-Witzer

Evan Fray Witzer (*pro hac vice pending*)
CIAMPA FRAY-WITZER, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Tel: (617) 426-0000
Fax: (617) 507-8043
Evan@CFWLegal.com

/s/ Matthew Shayefar

Matthew Shayefar (*pro hac vice pending*)
Valentin Gurvits (*pro hac vice pending*)
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Tel: (617) 928-1800
Fax: (617) 928-1802
matt@bostonlawgroup.com
vgurvits@bostonlawgroup.com